

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LIGHTHOUSE FINANCIAL GROUP,  
Individually and on Behalf of All Others  
Similarly Situated, : Civil Action No. 1:11-cv-00398-GBD  
: CLASS ACTION  
:

Plaintiff,

vs.

THE ROYAL BANK OF SCOTLAND  
GROUP, PLC, et al.,

Defendants.

ETHAN GOLD, Individually and on Behalf of  
All Others Similarly Situated, : Civil Action No. 1:11-cv-01162-NRB  
: CLASS ACTION  
:

Plaintiff,

vs.

THE ROYAL BANK OF SCOTLAND  
GROUP, PLC, et al.,

Defendants.

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DECLARATION OF DAVID A. ROSENFELD IN SUPPORT OF IBEW LOCAL UNION NO.  
58 PENSION TRUST FUND AND ANNUITY FUND'S MOTION FOR APPOINTMENT AS  
LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD  
COUNSEL

I, DAVID A. ROSENFELD, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of New York and this Court. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, proposed lead counsel for proposed lead plaintiff in the above-entitled actions. I make this declaration in support of the IBEW Local Union No. 58 Pension Trust Fund and Annuity Fund's Motion for Appointment as Lead Plaintiff and Approval of Lead Plaintiff's Selection of Lead Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: Notice of pendency of class action published in *PR Newswire*, a national business-oriented wire service, on February 18, 2011;

Exhibit B: The Pension and Annuity Funds' Sworn Certifications;

Exhibit C: Chart of the Pension and Annuity Funds' Transactions; and

Exhibit D: Robbins Geller Rudman & Dowd LLP firm résumé.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 19th day of April, 2011, at Melville, New York.

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s/DAVID A. ROSENFELD

DAVID A. ROSENFELD

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2011, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 19, 2011.

s/ DAVID A. ROSENFELD  
DAVID A. ROSENFELD

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& DOWD LLP  
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# Mailing Information for a Case 1:11-cv-00398-GBD

## Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Charles H. Dufresne , Jr**  
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- **Paul Adam Engelmayer**  
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- **Shauna Kathleen Friedman**  
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- **David Sapir Lesser**  
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- **Robert Walter Trenchard**  
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## Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Ethan Gold

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Irving Firemen's Relief and Retirement Fund

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